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9
10 Attorney for Defendant and
11 Counterclaimant Kieu Hanh Trading, Inc.
12 doing business as Kieu Hanh Jewelry
13 (erroneously sued as Kieu Hanh Jewelry)

14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA (SOUTHERN DIVISION)**

16 VERRAGIO, LTD.,

17 Plaintiff,

18 vs.

19 KIEU HANH JEWELRY,

20 Defendant.

21 KIEU HANH TRADING, INC., doing
22 business as KIEU HANH JEWELRY,

23 Counterclaimant,

24 vs.

25 VERRAGIO, LTD.,

26 Counterclaim Defendant.

14 **CASE NO.: 8:15-cv-00688-CJC-DFM**

15 **NOTICE OF SETTLEMENT**

16 ROZSA LAW GROUP LC
17 ATTORNEYS AT LAW
18 18757 BURBANK BOULEVARD, SUITE 220
19 TARZANA, CALIFORNIA 91356-3346
20 TELEPHONE (818) 783-0990

1 TO THE COURT:

2 PLEASE TAKE NOTICE, pursuant to Local Rule 16-15.7, that Plaintiff–Counterclaim
3 Defendant Verragio, Ltd. has reached a resolution with Defendant–Counterclaimant Kieu Hanh
4 Trading, Inc., erroneously sued as Kieu Hanh Jewelry in this action. This resolution will resolve
5 this matter in its entirety. The parties are currently working to finalize the settlement agreement
6 relating to this resolution. The parties expect to file a dismissal within twenty-one (21) days.
7 Therefore, the parties respectfully request that the current hearings, dates, and deadlines be
8 vacated so that the parties can finalize performance of the terms of the agreement and file the
9 dismissal.

10 Pursuant to Local Rule 5-4.3.4(a)(2), counsel for Defendant – Counterclaimant attests
11 that counsel for Plaintiff – Counterclaim Defendant concurs in the content of this Notice of
12 Settlement and has authorized its filing with his electronic signature.

13 Dated: March 31, 2016

TUCKER ELLIS LLP

14 By: /s/ Howard A. Kroll
15 Howard Kroll
16 Attorney for Plaintiff and
17 Counterclaim Defendant
Verragio, Ltd.

18 Dated: March 31, 2016

ROZSA LAW GROUP L.C.

19 By: /s/ Thomas I. Rozsa
20 Thomas I. Rozsa
21 Zsofia Nemeth
22 Attorneys for Defendant and Counterclaimant
23 Kieu Hanh Trading, Inc. d/b/a Kieu Hanh Jewelry

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2 **PROOF OF SERVICE**

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5 I declare that I am over the age of eighteen (18) years and not a party to this action. My
6 business address is 18757 Burbank Boulevard, Suite 220, Tarzana, California 91356-3346.

7

8

9 On March 31, 16, I have served on the parties or their counsel shown below, the
10 following documents described as:

11

12

Howard A. Kroll, Esq. Tucker Ellis LLP 515 South Flower Street Forty-Second Floor Los Angeles, CA 90071-2223 Facsimile: (213) 430-3400 [howard.kroll@tuckerellis.com]	Attorneys for Plaintiff Verragio, Ltd.
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13 [] **BY MAIL.** I am readily familiar with the firm's practice of collection and processing of
14 correspondence for mailing with the United States Postal Service. Under that practice the
15 correspondence was deposited with the United States Postal Service on the same day this
16 declaration was executed in the ordinary course of business. Under that practice, the
17 envelope(s) was (were) sealed, and with postage thereon fully prepaid, placed for
18 collection and mailing on this date by first class mail at Tarzana, California addressed as
19 set forth below.

20 [] **BY FEDERAL EXPRESS.** I placed the document(s) listed above with fees thereon
21 fully prepaid for deposit with Federal Express (next business day delivery), this same day
22 following ordinary business practices to the address(es) set forth below.

23 [] **BY FACSIMILE TRANSMISSION.** I caused the above-referenced document to be
24 transmitted by facsimile to its intended recipient(s) at the following facsimile number:

25 [X] **BY E-MAIL.** Based on a court order or an agreement of the parties to accept service by
26 e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at
27 the e-mail address(es) indicated above through the Court's ECF service.

28 I hereby declare under penalty of perjury that the foregoing is true and correct. Executed
29 on March 31, 16 at Tarzana, California.

30
31 /s/ Zsophia Nemeth
32 Zsophia Nemeth